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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 SHARON PEPOWSKI, an individual,)	Case No.	2:21-cv-01990-ART-VCF
)		
13 Plaintiff,)		
14 vs.)		
)	STIPULATION AND ORDER TO	
15 ALBERTSON'S LLC, a Foreign Limited)	CONTINUE DEADLINE FOR	
16 Liability Company, d/b/a ALBERTSON'S #93,)	PROPOSED JOINT PRETRIAL ORDER	
BOULDER INVESTCO, LLC, a Foreign)	FOR 14 DAYS	
17 Limited Liability Company, SUPERIOR)		
ELECTRICAL, MECHANICAL AND)		
18 PLUMBING, INC., a Foreign Corporation,)		
DOE EMPLOYEES I through X, and ROE)		
19 BUSINESS ENTITIES I through X inclusive)		
)		
20 Defendants.)		
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 25 Plaintiff SHARON PEPOWSKI ("*Plaintiff*"), by and through her counsel of record,
 26 Kevin R. Hansen, Esq. and Amanda A. Harmon, Esq. of the LAW OFFICES OF KEVIN R. HANSEN,
 27 and Defendants Albertson's LLC ("*Albertson's*"), by and through its attorneys of record, Jack P.
 28 Burden, Esq. and Dallin Knecht, Esq. of the law firm of BACKUS | BURDEN, and Defendant
 Superior Electrical Mechanical & Plumbing, Inc., by and through its attorney of record, D. Jason

1 Ferris, Esq., of the law firm LUH & ASSOCIATES, hereby stipulate and agree to an extension of the
2 deadline to file the Proposed Joint Pretrial Order by fourteen (14) days.

3 The Proposed Joint Pretrial Order is currently due to the Court by June 20, 2023. The
4 Parties anticipate potential resolution of this case prior to trial. The requested extension will allow
5 the parties sufficient time to engage in discussions regarding resolution and/or prepare the Joint
6 Pretrial Order.

7 Pursuant to LR IA 6-1(a), the Parties hereby aver that this is the first extension requested
8 as it relates to the Joint Pretrial Order. Moreover, pursuant to Local Rule 26-3, it is respectfully
9 submitted by the Parties' that good cause exists for an extension of this deadline, as mentioned
10 above. Further, failure to request the instant extension prior to the filing deadline was the result of
11 excusable neglect; specifically noting the failure to request the extension at an earlier date was a
12 mere oversight by the Parties. *See Bateman v. U.S. Postal Service*, 231 F.3d 1220 (9th Cir. 2000).
13 Further: 1) there is no danger of prejudice as the extension is stipulated by the Parties; 2) a thirty
14 (30) day extension will not impact a trial date because the same has not been scheduled; 3) the
15 Parties are hopeful to attend a settlement conference prior to trial; and 4) the requested extension is
16 made in good faith by the Parties. *Pioneer Investment Services v. Brunswick Associate's, Ltd.*,
17 507 U.S. 380, 395 (1993).

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As such, the Parties stipulate and agree to jointly ask the Court to extend the deadline to submit the Proposed Joint Pretrial Order by 14 days to July 4, 2023.

IT IS SO STIPULATED.

DATED: this 20th day of June, 2023.

LAW OFFICES OF KEVIN R. HANSEN

By: /s/ Kevin R. Hansen

Kevin R. Hansen, Esq.

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Attorneys for Plaintiff

Sharon Peplowski

DATED: this 20th day of June, 2023.

BACKUS | BURDEN

By: /s/ Dallin Knecht

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Attorneys for Defendant

Albertson's LLC

DATED: this 20th day of June, 2023

LUH & ASSOCIATES

By: /s/ D. Jason Ferris

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Attorneys for Defendant/Third-Party Defendant

Superior, Electrical, Mechanical & Plumbing, Inc.

ORDER

IT IS HEREBY ORDERED THAT THE PARTIES SHALL SUBMIT THE PROPOSED JOINT PRETRIAL ORDER BY JULY 4, 2023.

IT IS SO ORDERED.

DATED THIS 21st DAY OF JUNE 2023


UNITED STATES MAGISTRATE JUDGE